



Jessie White

From: Jim Scholl [jim_scholl@dot.state.ak.us]
Sent: Monday, April 09, 2007 8:00 AM
To: 'Jessie White'
Subject: FW: Comments Draft Amendment # 13 (Major) to the 2006-2009 Statewide Transportation Improvement Program (STIP)
Attachments: SEACC Comments on Draft Amendment 13 FINAL LH.pdf

Jessie, log this in and the attachment as a comment. Thanks!

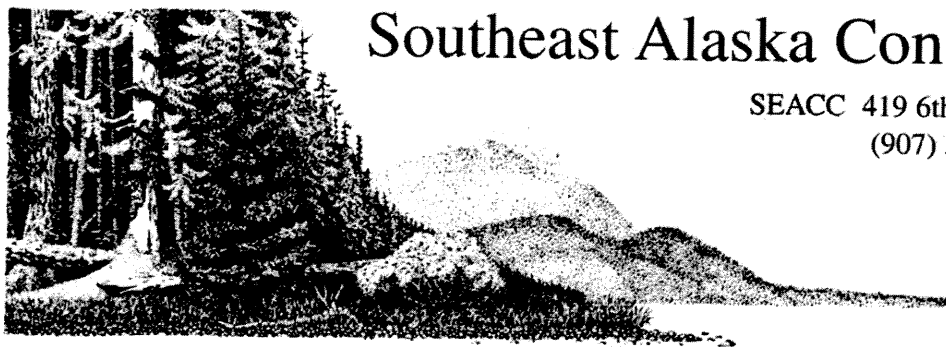
From: Buck Lindekugel [mailto:Buck@seacc.org]
Sent: Friday, April 06, 2007 3:52 PM
To: DOT_STIP@dot.state.ak.us
Subject: Comments Draft Amendment # 13 (Major) to the 2006-2009 Statewide Transportation Improvement Program (STIP)

Howdy folks! Please accept the following comments on the above-referenced STIP. Thanks!

Buck Lindekugel,
Conservation Director
SEACC
419 6th Street, #200
Juneau, AK 99801

buck@seacc.org
Become a member of SEACC today -- www.seacc.org

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April 6, 2007

Via email: DOT_STIP@dot.state.ak.us

STIP

Division of Program Development

Alaska Department of Transportation and Public Facilities

PO Box 112500

Juneau, AK 99811-2500

Re: Draft Amendment # 13 (Major) to the 2006-2009 Statewide Transportation Improvement Program (STIP)

To Whom It May Concern:

Please accept the following comments on draft amendment #13 (Major) to the 2006-2009 STIP from the Southeast Alaska Conservation Council (SEACC). According to the online public notice, dated March 5, 2007, comments are due today, April 6, 2007.

SEACC is a coalition of eighteen volunteer citizen conservation groups in fourteen communities across Southeast Alaska, from Ketchikan to Yakutat. SEACC is dedicated to safeguarding the integrity of Southeast Alaska's unsurpassed natural environment while providing for the sustainable use of our region's resources.

SEACC is also a member of the Alaska Transportation Priorities Project (ATTP). For the record we fully support the comments submitted on April 5th on this draft amendment #13 to the STIP by ATTP. We would, however, like to supplement those comments in several respects.

Our first comment relates to whether or not the State should include the three mega-projects -- Juneau Access Improvements, the Knik Arm Bridge, and Gravina Bridge -- listed in the draft STIP. Given the uncertainty and likely underestimation of the costs of these three mega-projects, they should be removed from the STIP at this time. Federal law requires that the STIP "shall include a project, or an identified phase of a project, only if full funding can reasonably be anticipated to be available for the project within the time period contemplated for completion of the project." 23 U.S.C. § 135(f)(2)(D). DOT has not identified sufficient sources of funding for these three projects and, in light of

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• FRIENDS OF BERNERS BAY, Juneau • FRIENDS OF GLACIER BAY, Gustavus • JUNEAU AUDUBON SOCIETY • JUNEAU GROUP SIERRA CLUB • LOWER CHATHAM
CONSERVATION SOCIETY, Port Alexander • LYNN CANAL CONSERVATION, Haines • NARROWS CONSERVATION COALITION, Petersburg • LISIANSKI INLET RESOURCE
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declining federal funding and the fact that project-specific earmarks are highly unlikely there is no reasonable expectation of full funding for these projects.

Next, the most recent incarnation of the Juneau Road/Ferry project is inconsistent with the Statewide Transportation Plan, which specifically calls for a highway link between Juneau and Skagway. Instead of providing a full highway link between Juneau and Skagway, the approved project only partially extends the highway link, from Echo Cove to the Katzechin River Delta. Neither SEACC nor the ATTP support a full highway link between Juneau and Skagway or the current proposal to partially extend the highway from Juneau to the Katzechin River delta. We believe that the Alaska Marine Highway System is the best way to provide transportation in Lynn Canal. The point we wish to emphasize in these comments, however, is that DOT lacks authority to include a project on the STIP that is inconsistent with the Statewide Transportation Plan. *See* 23 U.S.C. § 135(g)(4)(D)(I) (stating that every project included in the STIP must be “consistent with the statewide transportation plan”); 23 C.F.R. § 450.216(a)(3) (stating that the STIP shall “[c]ontain only projects consistent with the statewide plan”). For that reason, DOT should remove the Juneau Road/Ferry project from the STIP.

Finally, in addition to the process concerns raised by ATTP, we are also concerned about the scope of this STIP. SAFETEA-LU and FHWA regulations require that the STIP cover a period of four years. *See* 23 U.S.C. 135; 23 C.F.R. 450.216 (March 16, 2007). The STIP currently covers only three years, and therefore does not satisfy federal requirements. The STIP should set out Alaska's transportation priorities for the years 2007 through 2010, and ATTP requests that ADOT&PF prepare a STIP that meets this requirement and give Alaskans the opportunity to evaluate that updated draft program.

Thank you for your attention to these comments.

Best Regards,

A handwritten signature in black ink, appearing to read "Buck Lindekugel". The signature is stylized with a large, sweeping initial "B" and a long, horizontal stroke at the end.

Buck Lindekugel
Conservation Director